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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

OUR OWN CANDLE COMPANY, INC., on
behalf of itself and all others similarly situated,

Civil Action No.: 23-2174 (WJM)(JBC)

Plaintiff,
v.

GIVAUDAN S.A.; GIVAUDAN
FRAGRANCES CORPORATION; GIVAUDAN
FLAVORS CORPORATION; UNGERER &
COMPANY, INC.; INTERNATIONAL
FLAVORS & FRAGRANCES INC.; SYMRISE
AG; SYMRISE INC.; SYMRISE US LLC;
FIRMENICH INTERNATIONAL S.A.;
FIRMENICH INCORPORATED; and AGILEX
FLAVORS & FRAGRANCES, INC.,

**STIPULATION and
ORDER**

Defendants.

IT IS HEREBY STIPULATED AND AGREED by and among Plaintiff and Defendants Givaudan Fragrances Corporation, Givaudan Flavors Corporation, Ungerer & Company, Symrise, Inc., Symrise US LLC, Firmenich Incorporated, and Agilex Flavors & Fragrances, Inc. (collectively, the “Stipulating Defendants”), subject to the reservation of rights contained in paragraph 5 below, as follows:

1. The Stipulating Defendants’ time to answer, move, or otherwise respond to the Complaint is suspended pending Plaintiff’s filing of an amended complaint.

2. Plaintiff may file an amended complaint on or before the earlier of 45 days after (a) the date of the entry of this Stipulation and Order as an Order by the Court, or (b) service of the Complaint on Givaudan S.A., Symrise AG, and Firmenich International S.A. in accordance with the Hague Convention is complete.

3. After service is complete on all Defendants and Plaintiff files the amended complaint, Plaintiff and Defendants shall meet and confer with respect to a common schedule for Defendants to answer, move, or otherwise respond to the amended complaint. Notwithstanding the foregoing, if another plaintiff or plaintiffs files and serves a complaint or complaints against the Stipulating Defendants with respect to the same subject matter as Plaintiff's complaint, Stipulating Defendants shall answer, move, or otherwise respond to the then-operative complaint in this action no less than 10 days before Stipulating Defendants' response would be due on the earliest schedule as might be agreed in said other action(s).

4. Plaintiff will provide a draft ESI Protocol and Confidentiality Order to Stipulating Defendants within 10 days of the entry of this Stipulation and Order as an Order by the Court for the purposes of meeting and conferring with respect to entry of the ESI Protocol and Confidentiality Order.

5. Except as to the defense of insufficiency of service of process and insufficiency of process in this action, no defense of any of the Stipulating Defendants, including without limitation defenses based upon lack of personal jurisdiction, is prejudiced or waived by such defendant's executing, agreeing to, joining, or filing this Stipulation.

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.
Attorneys for Plaintiff

By: /s/ Lindsey H. Taylor
LINDSEY H. TAYLOR

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON, LLP
Attorneys for Defendants
GIVAUDAN FRAGRANCES
CORPORATION, GIVAUDAN FLAVORS

Dated: May 19, 2023

CORPORATION and UNGERER &
COMPANY

By: /s/ Audra J. Soloway
AUDRA J. SOLOWAY

Dated: May 19, 2023

WHITE & CASE LLP
Attorneys for Defendants
SYMRISE, INC. and SYMRISE US LLC

By: /s/ Martin M. Toto
MARTIN M. TOTO

Dated: May 19, 2023

DUANE MORRIS LLP
Attorneys for Defendants
FIRMENICH INCORPORATED and
AGILEX FLAVORS & FRAGRANCES,
INC.

By: /s/ Sean P. McConnell
SEAN P. McCONNELL

Dated: May 19, 2023

SO ORDERED this 22nd day of May, 2023



JAMES B. CLARK, III, U.S.M.J.